REMARKS/ARGUMENTS

Claims 1-40 are pending in the application. Claims 2 and 20 have been amended. Favorable reconsideration of the application, as amended, is respectfully requested.

I. REJECTIONS OF CLAIMS 1-40 UNDER 35 U.S.C. §§ 102(e) AND 103(a)

Claims 14-16, and 18 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,457,803 ("Ohkoda"). Claims 1, 10-13, 17, 19, 26-30, and 33-39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ohkoda in view of U.S. Patent No. 6,168,320 ("Ono"). Claims 2-9, 20-25, 31, 32, and 40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ohkoda in view of U.S. Patent No. 6,457,803 ("Broder"). All pending claims are believed to be allowable for the following reasons. Withdrawal of the rejections is respectfully requested.

Independent Claims 1, 19, 33, and 34

Independent claims 1, 19, 33, and 34 are directed to a dot-recording device, a dot-recording method, a print control device, and a computer program product, respectively. Specifically, claims 1, 19, 33, and 34 require that "the controller has:

(a) a first recording mode to effect printing near an edge of the printing medium, in the first recording mode the controller performing edge printing by ejecting ink droplets from at least some of the dot-forming elements disposed opposite the slot and without ejecting ink droplets from dot-forming elements other than the dot-forming elements disposed opposite the slot, and

(b) a second recording mode to effect printing in an intermediate portion of the print medium."

Support for the above-identified claimed features is found at, for example, page 69, line 27 - page 71, line 16 referring to Fig. 38 of the present specification.

The Ohkoda patent does not disclose the controller having a first recording mode and a second recording mode, as recited in claims 1, 19, 33, and 34. For example, in the recording head 124 of Ohkoda shown in Figs. 15 and 16, nozzles which are not disposed opposite a slot discharge ink droplets 126a. Therefore, Ohkoda cannot be said to teach or suggest at least the above-identified claimed element, i.e., "without ejecting ink droplets from dot-forming elements other than the dot-forming elements disposed opposite the slot."

Nor does the Ono patent teach or suggest the above-identified claimed elements (a) and (b) recited in claims 1, 19, 33, and 34. The Ono patent is generally related to use of one-pass printing and multi-pass printing. However, the combined use of the one-pass and four-pass printing modes according to the Ono patent fails to teach or suggest the selective use of dot-forming elements based on their location relative to the slot as claimed. As such, the Ono patent does not make up the deficiencies of the Ohkoda patent.

As a preliminary matter, it seems like that the Examiner did not cite the claim language properly. See, page 7, lines 14 and 16 of the Office Action dated September 11, 2003. The relevant portion of the Office Action reads "dot-forming elements near the edge of the printing medium." However, the currently pending claims do not contain such language. As set forth above, independent claims recite "the dot-forming elements disposed opposite the slot," and "dot-forming elements other than the dot-forming elements disposed opposite the slot" as submitted in the Amendment dated June 3, 2003. Therefore, Applicant respectfully requests that the Examiner properly cite references based on the currently pending claim language.

Most notably, the Ono patent fails to teach or suggest a slot extending in a main scanning direction in general, much less a specific relationship between the dot-forming elements and the slot. Independent claims 1, 19, 33, and 34 require that the dot-forming elements disposed opposite the slot eject ink droplets, and that dot-forming elements other than the dot-forming elements disposed opposite the slot not eject ink droplets. Nothing in the Ono patent shows the claimed relationship between the dot-forming elements and the slot.

The Examiner cited various descriptions in the Ono patent referring to Figs. 5A and 5B. However, these descriptions are silent on the claimed "slot extending in a main scanning direction." Thus, Applicant respectfully disagrees the Examiner's assertion that Ono discloses the claimed first and second recording modes.

Therefore, Ono cannot be said to cure the deficiencies of Ohkoda. Accordingly, the inventions of independent claims 1, 19, 33, and 34, and their dependent claims are believed to be patentable over these references. Withdrawal of the rejections is respectfully requested.

Independent Claims 2 and 20

Independent claims 2 and 20 contain recitations similar to those of claims 1 and 19, respectively. Therefore, claims 2 and 20 are believed to be allowable for at least the reasons set forth above in connection with claims 1, 19, 33, and 34. Withdrawal of the rejections is respectfully requested.

Independent Claims 14 and 15

Independent claims 14 and 15 have been amended to further clarify the pertinent features of the invention. Independent claim 14 recites the "first slot for receiving the ink droplets," and independent claim 15 recites the "first slot for receiving the ink droplets," and the "second slot for receiving the ink droplets." Support for these amendments is found at, for example, Fig. 38 and its corresponding description of the present specification.

Claim 14 requires the first support, the first slot, and the second support which are positioned in this order from the upstream to the downstream in the sub-scanning direction. See, claim 14,

> "a first support ... at a position opposite a first sub-group ... ;
>
> a first slot ... at a position opposite a second sub-group ... disposed ... downstream from the first sub-group ... ; and
>
> a second support ... at a position opposite a third sub-group ... disposed ... downstream from the second sub-group ... ."

Similarly, claim 15 requires the first support, the first slot, the second support, and the second slot which are positioned in this order from the upstream in the sub-scanning direction. It is respectfully submitted that the Ohkoda patent fails to teach or suggest the above-identified claimed elements arranged in the claimed configuration.

In the Ohkoda printer as shown in Fig. 15, when the first movable platen plate 122 closes the front side ink receiving port 132, there is no slot for receiving the ink droplets as claimed. Alternatively, when the first movable platen plate 122 opens the front side ink receiving port 132, Ohkoda merely shows a slot, and two supports in this order, as opposed to the first support, the first slot, and the second support in this order (see, claims 14 and 15). Therefore, the Ohkoda printer fails to teach or suggest the claimed elements regardless of whether the movable platen plate 122 is opened or closed.

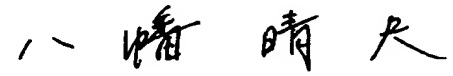
The same argument holds true with respect to Fig. 16 of Ohkoda. Specifically, Fig. 16 shows two supports, and a slot in this order. However, it does not teach or suggest the first support, the first slot, and the second support in this order, as claimed.

In view of the foregoing, the Ohkoda patent cannot be said to anticipate the invention of claims 14 and 15. Therefore, independent claims 14 and 15, and their dependent claims are believed to be allowable over the cited art. Withdrawal of the rejections is respectfully requested.

II. CONCLUSION

Applicant believes that all pending claims are in condition for allowance, and respectfully requests a Notice of Allowance at an early date. If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 510-843-6200, ext. 245.

Respectfully submitted,
BEYER WEAVER & THOMAS, LLP



Haruo Yawata
Limited Recognition under 37 CFR § 10.9(b)

P.O. Box 778
Berkeley, CA 94704-0778
Tel: 510-843-6200, ext. 245